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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHENG THAO,
 ANDRE JONES,
 DAVID TRUNG DUONG, and
 ANDY HUNG DUONG,

Defendants.

NO.:

MOTION FOR SEALING ORDER

UNDER SEAL

FILED

JAN 09 2025

CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

[Handwritten signature]

CR 25 0003 YGR

The United States, by and through its counsel, Assistant United States Attorneys Abraham Fine, Molly Priedeman, and Lloyd Farnham, moves this Court for an order sealing the government's application for a sealing order, the sealing order, the indictment, the arrest warrants, and all attachments in the above-referenced case. Disclosure of the specified documents might jeopardize the progress of this ongoing investigation that is neither public nor known to unidentified co-conspirators of the investigation. The United States requests that the indictment and arrest warrants be unsealed after the

1 United States has filed a notice with the Court confirming that defense counsel for one or more of the
2 defendants have been notified of the pending charges.

3 Accordingly, the United States requests that the Court seal these documents, except that the
4 Clerk of Court shall provide copies of the sealed documents to employees of the United States
5 Attorney's Office. The United States further requests that the United States Attorney's Office be
6 permitted to share these documents as necessary to comply with its discovery obligations, and with
7 agents of the FBI, IRS-CI and USPIS.

8 DATED: January 9, 2025

PATRICK D. ROBBINS
Attorney for the United States
Acting under Authority Conferred by 28
U.S.C. § 515

11 /s/
12 ABRAHAM FINE
13 MOLLY K. PRIEDEMAN
14 LLOYD FARNHAM
Assistant United States Attorneys